Auditors Worksheet	Ors Worksheet Circle one: Conformance Nonconformance		
Element No.	(1) Documentation of Biosolids BMP	Audit Number:	01-2017-01
Provide lead auditor first followed by auditor assistants along with classifications	Dave Harris (Wastewater O&M Supervisor)		
Audit date(s)	3/18/17		
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Element 16 - Internal EMS Audit 2017 docx	Page 4 of 21		

Table 16.1.1 - Internal Auditor's Minimum Question Checklist

Table 16.1.1 – Internal Auditor's Minimum Question Checklist		
Element 1 Documentation of BMP	Record audit number from worksheet:	01-2017-01
Requirement	Questions/Considerations	Auditor Notes
Document the BMP for Biosolids in an BMP Manual or equivalent set of program documents that describe, at least at a general level, the applicable policies, programs, plans, procedures, and management practices in the BMP.	Can you show me your BMP manual?	Yes. The BMP manual are on the internet at on the City ESD Sharepoint site. It is also located on the public City of Grand Rapids website for public view at http://grcity.us/enterprise-services/Environment-Services/Pages/Biosolids-BMP.aspx
Approve the BMP Manual by a level of the organization's management with the authority to commit people and resources to biosolids management activities.	Has your BMP manual been approved by the department Director?	Yes. The ESD Manager has reviewed and approved it.
Contain, in the BMP Manual, the organization's Biosolids Management Policy and BMP Procedures required by the BMP Elements.	Can you show me your Biosolids Management Policy? Can you show me the elements of your policy identified in Table 1.1 of your BMP manual?	The BMP Management policy is specified in element 2 of the BMP manual. Yes. This is spelled out in table 1.1 in element 1.
Contain or cross-reference, in the BMP Manual, public participation, communications, and emergency preparedness and response programs and plans required by the <i>BMP Elements</i> .	Can you show me some examples of how you have cross referenced public participation in your manual? Can you show me some examples of how you have cross referenced	Yes. Elements 2,5,7 and 12 are reference with element 6. Yes. Elements 6 and 7 are cross reference with element 9.
	communications in your manual? Can you show me some examples of how you have cross referenced	Yes. Element 12 is cross referenced with element 11 and references our spill plan SOP # 1114 for containment of spills
	emergency preparedness and response programs and plans in your manual? Were Critical Control Points, as identified in the Manual of Good	Yes. In element 3.
Cover, in the BMP Manual, all applicable, relevant, and selected critical control points for biosolids management activities throughout the biosolids value chain.	Practice – Appendix F, for biosolids management activities throughout the biosolids value chain considered during program development?	
In the BMP Manual, include or cross-reference all operational controls, procedures, processes, and other management methods used to achieve and maintain compliance with legal and other requirements.	Can you provide examples showing how operational controls, procedures, processes, and other management methods used to achieve and maintain compliance with legal and other requirements are cross referenced in the BMP manual?	Yes. Elements 3, 4 and 10 reference the operational controls relative to the legal requirements of element 4.
In the BMP Manual, describe those biosolids management activities assigned to and performed by contractors.	Does the BMP manual state which Biosolids management activities are assigned to contractors?	Yes. Table 7.1 in element 7.
Contain in the BMP Manual must be documentation of support for the NBP letter of understanding.	Does the BMP Manual contain documentation of support for the NBP letter of understanding?	Yes. This is shown in element 1. (Letter of understanding).
Accurately describe the process used by the facility to handle solids.	Have fundamental changes been made to the solids handling process that need to be reflected in the process description in this Element?	Yes. Changes have been made in the past when critical control points are changed or new CCP's come to be. It is current as of our last external (10 year platinum recertification audit).
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Auditors Worksheet	Circle one: Conform	nance Nonconformance	
Element No.	(2) Biosolids Management Policy	Audit Number:	02-2017-01
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Table 16.1.2 - Internal Auditor's Minimum Question Checklist

Table 16.1.2 – Internal Auditor's Minimum Question Checklist	D 1	03 2017 01
Element 2 Biosolids Management Policy	Record audit number from worksheet:	02-2017-01
Requirement	Questions/Considerations	Auditor Notes
Establish a Biosolids Management Policy that commits the organization to following the principles of conduct set forth in the Code of Good Practice and may include other biosolids commitments the organization voluntarily chooses to adopt.	Does the BMP commit our organization to the "Code of Good Practice"?	Yes, in element 2 by our mission statement.
Communicate the policy to employees, contractors, and all interested parties.	Can you show me how the biosolids management policy was communicated to employees, contractors, and interested parties?	Yes, in element 8 (training). BMP awareness and refresher training is kept in the BMP files in the BMP Coordinator's office as well as electronically on the ESD Sharepoint site. This is done for all WRRF and Sewer Maintenance employees as well as the Cordes Inc employees who haul Biosolids to landfill.
Incorporate the policy into the organization's biosolids programs, procedures, and practices.	Can you show me some examples of how the biosolids management policy has been incorporated into programs, procedures, and practices?	There are standard operating procedures that are linked to the critical control points located in element 3. This is also done in element 5 with goal setting and tracking.
Maintain a pretreatment program consistent with state and federal regulations identified in the NPDES permit.	Can you show an SOP used to insure compliance with a state or federal regulation?	Yes. SOP 3102 directs operators on the responsibilities of personal at the Market Avenue Retention Basin (MARB) with regards to our NPDES permit at that location. The SOP instructs plant staff in order to maintain the permit requirements for discharge to the Grand River at that location.
Monitor mercury in the plant influent and effluent and maintain existing pollutant minimization plan (PMP) practices and procedures identified in the NPDES permit.	Can you show me results from your mercury monitoring of the plant influent or effluent?	Yes. The IPP annual report 2016 in the ESD (U-Drive) under IPP – Annual Reports. The report is done annually around April 1 of the current year for the previous year. It is to be finalized by Kurt Anderson in IPP.
Develop contract dewatering specifications and contracts which emphasize product handling and final disposal.	Can you show me language in your dewatering specifications which emphasizes product handling and final disposal?	Yes. This information is located in the GVRBA Joint Operating Agreement. The City of Grand Rapids WRRF has been the sole contractor for dewatering of Biosolids for the Grand Rapids facility. Grand Rapids staff operates the solids handling facility for GVRBA. There are also landfill, trucking, carbon and polymer contracts to supplement the GR operational portion.

Auditors Worksheet	Circle one: Conform	mance Nonconformance	
Element No.	(3) Critical Control Points	Audit Number:	03-2017-01
Provide lead auditor first followed by auditor assistants along with classifications	Dave Harris (Wastewater O&M Supervisor)		
Audit date(s)	3/121/17 3/21/17		
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Table 16.1.3 - Internal Auditor's Minimum Question Checklist

Element 3 Critical Control Points	Record audit number from worksheet:	03-2017-01
Requirement	Questions/Considerations	Auditor Notes
Identify and document the critical control points of the organization's	Was Appendix F in the Manual of Good Practice considered when	Yes, in table 3.1 in element 3.
biosolids management activities throughout the biosolids value chain, consistent with those identified in the National Manual of Good Practice and other authoritative sources.	identifying your critical control points? Were all critical control points identified in Appendix F which were applicable to our operation implemented in our BMP?	Yes. Appendix F identifies critical control points that are applicable to our Biosolids Management Program.
Identify potential or actual environmental impacts at each critical control point.	Have potential or actual environmental impacts for each critical control point been identified? Is the list complete?	Yes. They are addressed in element 3. Yes.
Keep up-to-date information on the organization's critical control points.	Is up to date information maintained on Critical Control Points?	Yes. Information is up to date.
Maintain records that link each critical control point and its potential environmental impacts with the corresponding operational controls.	Are records maintained which link critical control points, environmental impacts, and operational controls?	Yes. Monitoring and measurement. An example would be WAS Thickening. Thickened WAS % TS, centrate TSS and Feed TSS are analyzed and monitored. Data goes into database. Solids concentrations are run daily by the laboratory.
For organizations that have successfully completed a third party verification audit, provide notification to the NBP (and assigned third-party verification auditor) following any operational change that requires a change to the identified critical control points or environmental impacts associated with the critical control points.	Have you had any operational changes that required a change to the identified critical control points or environmental impacts associated with the critical control points?	No. No changes have been necessary since last external (10) year audit. Since the last internal audit, WAS thickening SOP's 3350 and 3351 were completed by T. Dryer (WOMS). Composting is still listed as a CCP in our BMP; however it currently is not being used. All Grand Rapids Biosolids currently go to landfill.
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Auditors Worksheet	Circle one: Confor	mance Nonconformance	
Element No.	(4) Legal and Other Requirements	Audit Number:	04-2017-01
Provide lead auditor first followed by auditor assistants along with classifications	Dave Harris (Wastewater O&M Supervisor)		
Audit date(s)	3/121/17 3/21/17		
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Table 16.1.4 - Internal Auditor's Minimum Question Checklist

Element 4 - Legal and Other Requirements	Record audit number from worksheet:	04-2017-01
Requirement	Questions/Considerations	Auditor Notes
Establish a procedure for identifying and tracking legal (federal, state, and local) and other requirements applicable to its biosolids management	Is a procedure in place for tracking changes in legal and other requirements?	Yes. Element 4 (Figure 4.1). All legal items under "regulations and guidance" are reviewed annually.
activities. Establish and maintain records of applicable legal and other requirements.	Are records of legal and other requirements maintained? Is the list complete?	Table 7.2 is addresses this in element 7. Yes. Table 4.1 in element 4. Prior review of element 4 (legal requirements) are kept in the BMP files. Yes.
Include a management process for incorporating changes and new requirements into the elements of the BMP.	Is a process in place for incorporating changes and new requirements into the BMP manual?	Yes. This is addressed in document review in element 4 (Figure 4.1).
The City will utilize a variety of sources for identifying, tracking, analyzing, and interpreting the various legal and other requirements which impact the Biosolids value chain.	Can you document that you have monitored the National Biosolids Partnership website for information which may have impacted your program?	Yes. Legal requirements review from calendar year 2016. The sources were checked and were current.
On an annual basis, internal BMP team members will review Table 4.1 and submit an "Annual Legal and Other Requirements Document Review" form to the BMP coordinator.	Show your latest annual review forms.	Yes. The most current review is located in the BMP files.

Table 16.1 Internal Auditor's Worksheet			
Auditors Worksheet	Circle one: Conformance Nonconformance		
Element No.	(5) Goals & Objectives	Audit Number:	05-2017-01
Provide lead auditor first followed by auditor assistants along with classifications	Dave Harris (Wastewater O&M Supervisor)		
Audit date(s)	3/25/17		
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Table 16.1.5 – Internal Auditor's Minimum Question Checklist

Element 5 Goals and Objectives	Record audit number from worksheet:	05-2017-01
Requirement	Questions/Considerations	Auditor Notes
Establish and periodically review measurable biosolids program goals and objectives for biosolids management activities.	Are goals and objectives established? Are goals and objectives periodically reviewed? Do they support the four NBP outcome areas?	Goals for 2016 were established 4/11/16 per the BMP files; however there were no progress reports. This was reviewed in our external recertification audit in October of 2016.
Reflect, in program goals and objectives, identified priorities for improving environmental performance of biosolids management activities based on critical control points, identified or potential environmental impacts, legal and other requirements, and applicable best management practices as defined in the National Manual of Good Practice and various authoritative sources on biosolids management (e.g., Water Environment Federation Manuals of Practice).	Do the goals and objectives identified in table 5.1 reflect a commitment on the part of the City to improving the environment or biosolids quality?	Yes. Goals reflected this.
Consider, in developing program goals and objectives, input from interested parties developed through proactive public participation.	Is there evidence that input from interested parties was considered in developing goals and objectives?	Yes. Interested parties were notified. No public response was received.
Integrate goals and objectives with other elements of the BMP and biosolids management activities.	Are goals and objectives integrated with other elements of the BMP?	Yes. Goals are integrated in our BMP, particularly in elements 6, 9, 10, 15 and 17. They are also reviewed in our internal audit (element 16) as well as during our external audits.
Develop program goals and objectives using SMART criteria (I.e., be Specific, Measurable, Achievable, Relevant, and Time-bounded).	Is there evidence that a SMART criterion was used to select goals and objectives? Does each goal and objective meet SMART criteria requirements?	SMART form 5.3 was filled out by the BMP Coordinator and are located in the BMP folders with the three goals for 2016. This form assures our goals meet the criteria related to Biosolids and the critical control points.
Update program goals and objectives on a regular basis.	Are goals and objectives regularly updated?	One of the three goals were SOP's that were constructed for the Thickened Waste start up and shutdown procedures. This was done quickly and did not require progress reports. The other two goals did not have reports done, but the data is monitored in SCADA. This was reviewed with the auditor in October of 2016 during our 10th recertification audit.
Establish an action plan that describes those improvement activities it is pursuing to achieve biosolids program goals and objectives. Designate, in the action plan, schedules, milestones, resources, and responsibilities for achieving biosolids program goals and objectives.	Are action plans in place for each goal? Does each action plan contain schedules, milestones, resources, and responsibilities to achieve the objectives?	No. No action plans could be found in the BMP file. This was addressed and corrected during our external audit.
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Auditors Worksheet	Circle one: Conformance Nonconformance			
Element No.	(6) Public Participation in Pl	anning	Audit Number:	06-2017-01
Provide lead auditor first followed by auditor assistants along with classifications	Dave Harris (Wastewater O&M Su	pervisor)		
Audit date(s)	3/24/17			
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Table 16.1.6 - Internal Auditor's Minimum Question Checklist

Element 6 - Public Participation in Planning	Record audit number from worksheet:	06-2017-01
Requirement	Questions/Considerations	Auditor Notes
Select and implement a proactive public participation approach to involve interested parties in its Biosolids Management Program and BMP planning process.	Is there evidence that a proactive process was selected and implemented to seek public participation near the beginning of the BMP planning process?	Yes. This is addressed in element 6 of the BMP. A list of interested parties is notified and asked to participate if they so desire. The interested parties are reviewed each year and contacts are updated as interested parties change or are added to the list of interested parties.
Reflect, in the selected approach, the organization's commitments to the ten principles in the Code of Good Practice, including a plan for independent third-party verification of conformance with the BMP Elements.	Does element 6 commit the City to the Code of Good Practice? Does element 6 include information on the third party verification audit?	Yes. This is mentioned in element 6 of the BMP manual.
Select an approach that is consistent with the degree of current public interest, history of public involvement, method of biosolids management, and related local circumstances.	Is the City's approach to public participation consistent with the degree of current public interest in the City's biosolids program?	Yes. Public request for information form in element 9. Form 5.2 is also used with regard to information from interested parties.
Provide interested parties with meaningful opportunities to express views and perspectives relative to biosolids management activities, including concerns about environmental impacts, biosolids program performance, and potential areas for improvement.	Were opportunities provided for interested parties to provide input into the BMP? Did it include environmental impacts? Did it include biosolids program performance? Did it include potential areas for improvement?	Yes; Form 5.2 is sent to our interested parties with a list of potential goals. This is done prior to implementation of those goals. This help us assist in prioritizing those goals. Yes, Yes.
Consider input from interested parties in initially developing program goals and objectives during BMP implementation and in updating them as part of periodic review of biosolids management program performance.	Did the City consider input from interested parties when initially developing its program goals and objectives? Did the City consider input from interested parties when updating them as part of its periodic review of biosolids management program performance?	Yes. This is kept in a folder for element 6 under "Public Participation in Planning." Yes. A folder is kept in the BMP files with relation to goals for each year.
The City will maintain information related to the Biosolids management program and processes on the City's internet website.	Can you show the Biosolids information on your website?	Yes. It is located for the public to view on the website http://grcity.us/enterprise-services/Environment-Services/Pages/Biosolids-BMP.aspx It is also located on the City of Grand Rapids Sharepoint Site on the ESD location for City employees to view.
The City offers plant tours which can be customized to meet the needs of the group.	Can you show how information relating to Biosolids is communicated during plant tours?	Yes. The WRRF explains the value of Biosolids during tours and presentations. Methane recovery for beneficial reuse is explained to citizens, students, and other interested parties during tours.
Records will be maintained to document the City's responsiveness to public input and requests for information regarding the BMP.	Can you show your records in regard to public input?	Yes. A "Request for Information" Folder is is kept in the BMP files.
A list of interested parties must be created.	Can you show your up to date list of interested parties?	Yes. There is a list of interested parties that is a portion of element 6 in the BMP Manual. This list is updated when the City becomes aware of changes so that the element can be updated when needed.

Auditors Worksheet	Circle one: Confo	mance Nonconformance	
Element No.	(7) Roles & Responsibilities	Audit Number:	07-2017-01
Provide lead auditor first followed by auditor assistants along with classifications	Dave Harris (Wastewater O&M Supervisor)		-
Audit date(s)	3/25/17		
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Table 16.1.7 - Internal Auditor's Minimum Question Checklist

Element 7 - Roles and Responsibilities	Record audit number from worksheet:	07-2017-01
Requirement	Ouestions/Considerations	Auditor Notes
Establish and maintain records of the assigned roles and responsibilities for the Biosolids Management Program and activities. These records shall define and document roles and responsibilities of employees for performing biosolids management activities and BMP functions.	Can you show examples of how responsibilities have been assigned for the BMP?	Element 7 defines the parties that are responsible for the internal BMP team. The tables in element 7 identify the responsible parties for each critical control point.
Appoint an individual with overall responsibility for ensuring that Biosolids Management Program and BMP are implemented and maintained.	Has an BMP coordinator who has overall responsibility for the BMP been assigned?	Yes. Bill Kaiser is the City of Grand Rapids WRRF Biosolids Program Coordinator. Bill has had responsibility for the program since November of 2015. He has conducted the 2015 and 2016 external audits.
Provide the human, technical, and financial resources necessary to effectively execute these responsibilities.	Can you provide evidence of adequate staffing to carry out assigned responsibilities? Can you provide evidence of adequate maintenance and instrumentation services to carry out assigned responsibilities? Can you provide evidence of adequate financial resources to effectively execute these responsibilities?	Yes. The organizational chart for the department is located on the ESD Sharepoint site under the BMP heading. It is also on the public website. Yes. Our computerized monitoring maintenance system is tracked in Maximo. Yes. Approved ESD and GVRBA budgets.
Define and document the roles and responsibilities of contractors retained to perform various biosolids management activities and BMP functions through Service Agreements.	Have roles and responsibilities of contractors been defined in their service agreements?	Yes. The contractor critical control points are outlined in the contract documents and bid specifications. Participation and responsibility with the BMP is a requirement of the contractor.
The organizational chart shown in Figure 7.1 shows the reporting structure in place at the Grand Rapids facility.	Is your organizational chart up to date?	Yes. The organizational chart has been updated as of the ninth interim audit. With the City's transformation efforts to be more sustainable; the organizational chart has been updated several times over the last few years.
The contractor is responsible for following policies and procedures they develop which are necessary to ensure that operations are conducted in a safe and environmentally sound manner.	Is your contractor prepared to respond to emergency situations? Does your contractor have a safety program?	Yes. The contractor has a spill plan in place. The control copy is kept in a manual at Cordes Ince. facility. Drivers each have SOP copies including the spill plan in each vehicle.
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Auditors Worksheet	Circle one: Conformance (Vonconformance)			
Element No.	8 - Training		Audit Number:	08-2017-01
Provide lead auditor first followed by auditor assistants along with classifications	Nicole Pasch – Environment	al Assessment Supervis	sor (EAS)	
Audit date(s)	March 17, 2017 - March 22,	. 2017		
ist nonconformances: . 11 staff missed training, as noted on the "ESD	Employee List June 2015" co	olumn "2016 BMP Train	ing"	
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Comments: Reviewing the training documentation exception of 2016. 2016 was added to the 2015 of finally able to identify it using last changed information payroll representative, I found 14 having missed to training to have occurred; i.e. "2016 BMP Training "everyone" accounted for in training during the catefort must go into 4th quarter calendar year.	document within the 2015 fold ation. Using the paper copies raining, not including vacant Jan-Oct 31" as, we will have	der. 2016 training was s as compared to the 2 positions at year end o new staff up to the en	an added column to the 016 year end staffing information of the year that will ma	2015 document. I was that I had from our od of time reasonable f lke it difficult to have
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Table 16.1.8 – Internal Auditor's Minimum Question Checklist			
Element 8 Training	Record audit number from worksheet:		
Requirement	Questions/Considerations	Auditor Notes	
Establish and maintain a training program to ensure that employees responsible for specific biosolids management activities and for the implementation of various BMP functions are competent in performing their assigned tasks and duties. The training program shall provide general awareness of the BMP and how each employee's assigned roles and responsibilities relate to the entire biosolids value chain.	Did all employees receive general awareness training? What records support this training?	No. 11 employees at Environmental Services Department (ESD) did not receive general awareness training. Training records (paper) are filed by year and kept in the BMP Coordinator's office. These records include the d training, the name and signature of the employees who attended the training. Files are orderly and up to date. A consolidated training record by staff name is kept on the internal BMP SharePoint site, maintained by the BMI Coordinator and designated trainer staff. The document for 2016 was not as orderly as in the past. New/Transfe was captured for the majority of the year, but some was missed toward the year end.	
Include in the training program new or reassigned employees.	What actions are taken with new employees?	New employees at the ESD receive BMP Awareness Training as part of the orientation at ESD. This would include new hires and transferred employees. Some ESD orientation was not done as well as it could have been, mostly due to high numbers of employee turnover in 2016.	
Maintain records of individual employee training delivered and completed.	What training records do you maintain?	Training records are filed by year and kept in the BMP Coordinator's office. These records include the date of training, the name and signature of the employees who attended the training. Files are orderly and up to date. A consolidated list of training records are kept on the internal BMP SharePoint site. These records include the name of all employees for the given period, clock numbers for the employees, date of the BMP training received, Dept/Division, and Supervisor's name.	
Require that contractors establish their own training programs consistent with their roles and responsibilities in biosolids management activities as defined through Service Agreements.	What training records do you maintain?	BMP awareness training is conducted by the BMP Coordinator or their assigned delegate for all new contractors. Trained contractors receive BMP Refresher Training annually. These records are kept in the same training records kept for internal staff in the BMP Coordinator's office and on the SharePoint site.	
Maintain a training program that indicates training schedules by job classification	Is the training schedule up to date? Do the training records show that all employees have received the scheduled training?	Yes, the training schedule is up to date. No, several employees did not receive the training.	

Auditors Worksheet	Circle one: Conformance Nonconformance		
Element No.	9 – Communication and Public Outreach	Audit Number: 09-2017-01	
Provide lead auditor first followed by auditor assistants along with classifications			
Audit date(s)	March 17, 2017 – March 22, 2017		
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organization is appreciated.			
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ongoing information about the Biosolich Management Program and BMP in method of biscolicits management sublic communications history, and degree of current interest in the Biosolich Management activities. The procedure in the process for energy and requests for information and the process and requests for information and the process and papers for the communication history, and degree of current interest in 18 bitoolidis management activities. The procedure for receiving loquiries and requests for information and process for ensuring at involve and complete response to liquidities and process for ensuring a timely and complete response to liquidities and the process for ensuring a timely and complete response to liquidities and the process for ensuring a timely and complete response to liquidities and the process for ensuring a timely and complete response to liquidities and the process for ensuring a timely and complete response to liquidities by interested parties. How on management program and activities which the process for ensuring a timely and complete response to liquidities and the process for ensuring a timely and complete response to liquidities and the process for ensuring at timely and complete response to liquidities and the process for ensuring the process for ensuring and the process for ensuring and the process for ensuring the p	Requirement	Questions/Considerations	
Include a procedure for receiving inquiries and requests for information from interested parties about its biosolids management activities and IMP. The procedure shall define a process for assuring a timely and complete response to inquiries by interested parties. How can interested parties about this biosolids management activities and IMP. How do you make requests for information in provided promptly? How do you make requests for information in provided promptly? How do you make requests for information in provided promptly? How do you make requests for information in provided promptly? How do you make requests for information in provided promptly? How do you make requests for information in provided promptly? How do you make requests for information in provided promptly? How do you make requests for information in provided promptly? How do you make requests for information in provided promptly? How do you make requests for information in provided promptly? How do you make requests for information in provided promptly? How do you make requests for information in formation? At a minimum, make the following information about the organization's like the request for information in formation in provided promptly? How do you make request for information formation? At a minimum, make the following information about the organization's like the request for information information about the organization's office. At a minimum, make the following information about the organization's like to require a management program and entirely the provided promptly? How do you make the following information about the organization's office. At a minimum, make the following information about the organization's like to require for information information information in the information informati	ongoing information about the Biosolids Management Program and BMP to interested parties and the public, consistent with local circumstances, the method of biosolids management, public communications history, and		information is also available to all ESD and City employees on the ESD Sharepoint site. Additionally, BMP information is on the City of Grand Rapids' website - http://grcity.us/enterprise-services/Environment-services/Pages/Biosolids-BMP.aspx , making it accessible to everyone. Information about our BMP is also communicated during plant tours and other public outreach events staffed by ESD employees.
from interested partities about its biscoilids management activities and BMP. How do you struck requests for information is provided promptly? How do you track requests for information? At a minimum, make the following information about the organization? At a minimum, make the following information about the organization? At a minimum, make the following information about the organization? At a minimum, make the following information about the organization? At a minimum, make the following information about the organization? At a minimum, make the following information about the organization? At a minimum, make the following information about the organization? At a minimum, make the following information about the organization? At a minimum, make the following information about the organization? At a minimum, make the following information about the organization? At a minimum make the following information about the organization? At a minimum make the following information about the organization? At a minimum make the following information about the organization? At a minimum make the following information about the organization? At a minimum make the following information about the organization? At a minimum make the following information about the organization? At a minimum make the following information about the organization? At a minimum make the following information about the organization? At a minimum make the following information about the organization? At a minimum make the following information about the organization? At a minimum make the following information about the organization? A public Request for Information Form, purt of Element 9, is completed by the ESD employee who received the inquiry. All Public Request for Information Forms are filed by year and retained in the BMP Coordinator's office. A Public Request for Information Forms are filed by year and retained in the BMP Coordinator's office. A Public Request for Information Forms are filed by year and retained in			meetings, as well as the regular OMG meetings. Status of goals, objectives, non-conformances, action plans, etc. are discussed.
with workflows and alerts to management if not attended to within set time frames (48 business hours). Emerger needs would be conveyed to staff through both the service message and a phone call. The Facebook page has 5 or more administrators that can review and respond to messages. Most inquiries are responded to during normal business hours; however, if a message is urgent, an administrator will respond. Administrators have the Facebook application on their phones and alerts are sent to the BMP Coordinator and designated members, notifying them a submission has been made requiring review and potentially response required.: A Public Request for Information Form, part of Element 9, is completed by the ESD employee who received the inquiry. All Public Request for Information Forms are filled by year and retained in the BMP Coordinator's office Is the Biosolids Management Policy, and all severable parties? Is the periodic Biosolids Management activities of outside contractors in the Communication Program. Is there evidence of how contractors are to handle requests for information about the BMP is communicated to employees and contractors, consistent with assigned roles and responsibilities. With a minimum, make the following information about the organization's file and the Discolids Management Policy, and all seventeed elements of the BMP to employees and outside contractors, consistent with assigned roles and responsibilities.	from interested parties about its biosolids management activities and BMP. The procedure shall define a process for assuring a timely and complete	BMP? How do you assure that information is provided promptly?	a Grand Rapids phone line, or 616-456-3000 from anywhere. The e-mail <u>customerservice@grcity.us</u> is maintained by that team. The ESD Facebook page is maintained by ESD staff and is another avenue for contacting the Department. On the website is a comment form that can be completed; http://grcity.us/enterprise-services/Environment-
responded to during normal business hours; however, if a message is urgent, an administrator will respond. Administrators have the Facebook application on their phones and alerts are sent when messages are received to public page. The public comment/suggestion Form provides an opportunity for individuals to indicate if they would like to refuture e-mails related to the ESD's BMP program. B-mail alerts are sent to the BMP Coordinator and designated members, notifying them a submission has been made requiring review and potentially response required. A Public Request for Information Form, part of Element 9, is completed by the ESD employee who received the inquiry. All Public Request for Information Forms are filed by year and retained in the BMP Coordinator's office. By applicable legal and other requirements available to interested parties? a) the Biosolids Management Policy; b) applicable legal and other requirements; c) biosolids program goals and objectives for continual improvement; c) biosolids program goals and objectives for continual improvement; c) d) the periodic Biosolids management program performance report available to interested parties? b) the periodic Biosolids management program performance report available to interested parties? b) the periodic Biosolids management program performance report available to interested parties? b) the periodic Biosolids management program performance report available to interested parties? b) the periodic Biosolids management program performance report available to interested parties? b) the periodic Biosolids management program performance report available to interested parties? b) the periodic Biosolids management program performance report available to interested parties? b) the periodic Biosolids management program performance report available to interested parties? b) the periodic Biosolids management program performance reports are on the City's website — gricity.us available to interested parties? b) a periodic biosolids management program performance			Public Requests for Information through 3-1-1 are tracked in the crm software that has service messages established with workflows and alerts to management if not attended to within set time frames (48 business hours). Emergency needs would be conveyed to staff through both the service message and a phone call.
At a minimum, make the following information about the organization's Biosolids management program and activities available to interested parties: a) the Biosolids Management Policy, b) applicable legal and other requirements; c) biosolids program goals and objectives for continual improvement; d) the periodic Biosolids Management Program Performance Report; and e) a detailed report of the independent, third party BMP verification audit results. Define roles and responsibilities of outside contractors in the Communications Program. Communicate relevant information about biosolids Management activities and the Biosolids Management Policy, and all seventeen elements of the BMP to employees and outside contractors, consistent with assigned roles and responsibilities. Is the Biosolids Management Policy available to interested parties? Are legal and other requirements available to interested parties? Are legal and other requirements available to interested parties? Are legal and other requirements available to interested parties? Are legal and other requirements available to interested parties? Are legal and other requirements available to interested parties? Are legal and other requirements available to interested parties? Are legal and other requirements available to interested parties? Are legal and other requirements available to interested parties? Are legal and other requirements available to everyone on the City's website – gricty.us The goals and objectives are available to everyone on the City's website – gricty.us The goals and objectives are available to everyone on the City's website – gricty.us The goals and objectives are available to everyone on the City's website – gricty.us The goals and objectives are available to everyone on the City's website – gricty.us The goals and objectives are available to everyone on the City's website – gricty.us The goals and objectives are available to everyone on the City's website – gricty.us The goals and objectives are available to everyone on the City's website			responded to during normal business hours; however, if a message is urgent, an administrator will respond. Administrators have the Facebook application on their phones and alerts are sent when messages are received to the
At a minimum, make the following information about the organization's Biosolids management program and activities available to interested parties: a) the Biosolids Management Policy; b) applicable legal and other requirements; c) biosolids program goals and objectives for continual improvement; d) the periodic Biosolids Management Program Performance Report; and e) a detailed report of the independent, third party BMP verification audit results. Define roles and responsibilities of outside contractors in the Communications Program. Is there evidence of how contractors are to handle requests for information about the BMP is communicated to employees and outside contractors, consistent with assigned roles and responsibilities. Is there evidence that information about the BMP is communicated and responsibilities. Is there evidence that information about the BMP is communicated to employees and outside contractors, consistent with assigned roles and responsibilities. Is there evidence that information about the BMP is communicated and new requirements are available to interested parties? Are legal and other requirements available to interested parties? Are legal and other requirements are available to everyone on the City's website – grcity.us The Biosolids Management Policy is available to requirements are available to everyone on the City's website – grcity.us The periodic BMP Performance Reports are on the City's website – grcity.us The periodic BMP Performance Reports are on the City's website – grcity.us The periodic BMP Performance Reports are on the City's website – grcity.us Additionally, information will be distributed when requests are received. Element 9 specifies contractors are to "directly respond to information requests from their own employees. Con will direct other requests for information to the WPS(WRRF Plant Superintendent) who will provide a response' will direct other requests for information to the WPS(WRRF Plant Superintendent) who will provide a response' maintained and kept o			The public comment/suggestion Form provides an opportunity for individuals to indicate if they would like to receive future e-mails related to the ESD's BMP program. E-mail alerts are sent to the BMP Coordinator and designated staff members, notifying htem a submission has been made requiring review and potentially response required.:
At a minimum, make the following information about the organization's Biosolids management program and activities available to interested parties? a) the Biosolids Management Policy; b) applicable legal and other requirements; c) biosolids program goals and objectives available to interested parties? d) the periodic Biosolids Management Program Performance Report; d) the periodic Biosolids Management Program Performance Report; and e) a detailed report of the independent, third party BMP verification audit results. Define roles and responsibilities of outside contractors in the Communications Program. Is the Biosolids Management Policy available to interested parties? Is the periodic biosolids management program performance report available to interested parties? Is third party audit and verification audit results available to interested parties? Is there evidence of how contractors are to handle requests for information in element 9? Is there evidence of how contractors are to handle requests for information about biosolids management activities and the Biosolids Management Policy, and all seventeen elements of the BMP to employees and outside contractors, consistent with assigned roles and responsibilities. Is the Biosolids Management Policy available to interested parties? Is the Biosolids Management Policy available to interested parties? Is the periodic Biosolids Management Policy is available to interested parties? The Biosolids Management Policy is available to everyone on the City's website – grcity.us The peal and other requirements are available to everyone on the City's website – grcity.us The peal and other requirements are available to everyone on the City's website – grcity.us The peal and other requirements are available to everyone on the City's website – grcity.us The peal and other requirements available to interested parties? The Biosolids Management Policy is available to interested parties? The Biosolids Management Policy is available to interested parties? The Biosolids M			A Public Request for Information Form, part of Element 9, is completed by the ESD employee who received the inquiry.
Biosolids management program and activities available to interested parties: a) the Biosolids Management Policy; b) applicable legal and other requirements; c) biosolids program goals and objectives for continual improvement; d) the periodic Biosolids Management Program Performance Report; and e) a detailed report of the independent, third party BMP verification audit results. Define roles and responsibilities of outside contractors in the Communications Program. Communicate relevant information about biosolids management activities and the Biosolids Management Policy, and all seventeen elements of the BMP to employees and outside contractors, consistent with assigned roles and responsibilities. Are legal and other requirements available to interested parties? Is the periodic biosolids management program performance report available to interested parties? Is the periodic biosolids management program performance Report; and e) a detailed report of the independent, third party BMP verification audit results available to interested parties? Is there evidence of how contractors are to handle requests for information in element 9? Element 9 specifies contractors are to "directly respond to information requests from their own employees. Con will direct other requirements are available to everyone on the City's website – grcity.us The goals and objectives are available to everyone on the City's website – grcity.us The periodic BMP Performance Reports are on the City's website – grcity.us Third party audits, (and Internal Audits), are available to interested parties? Is the revidence of how contractors are to handle requests for information will be distributed when requirements are available to everyone on the City's website – grcity.us The goals and objectives are available to everyone on the City's website – grcity.us Third party audits, (and Internal Audits), are available to interested parties? Is there evidence of how contractors are to handle requests for information will be distributed when requirements a			
Communications Program. Communicate relevant information about biosolids management activities and the Biosolids Management Policy, and all seventeen elements of the BMP to employees and outside contractors, consistent with assigned roles and responsibilities. information in element 9? Is there evidence that information about the BMP is communicated to employees and contractors? Yes. All BMP training tracked by the BMP Coordinator and attendance forms for all BMP training sessions are maintained and kept on file.	Biosolids management program and activities available to interested parties: a) the Biosolids Management Policy; b) applicable legal and other requirements; c) biosolids program goals and objectives for continual improvement; d) the periodic Biosolids Management Program Performance Report; and e) a detailed report of the independent, third party BMP verification audit	Are legal and other requirements available to interested parties? Are goals and objectives available to interested parties? Is the periodic biosolids management program performance report available to interested parties? Is third party audit and verification audit results available to interested parties?	The legal and other requirements are available to everyone on the City's website – grcity.us The goals and objectives are available to everyone on the City's website – grcity.us The periodic BMP Performance Reports are on the City's website – grcity.us Third party audits, (and Internal Audits), are available on the City's website – grcity.us Additionally, information will be distributed when requests are received.
and the Biosolids Management Policy, and all seventeen elements of the BMP to employees and outside contractors, consistent with assigned roles and responsibilities.			Element 9 specifies contractors are to "directly respond to information requests from their own employees. Contractors will direct other requests for information to the WPS(WRRF Plant Superintendent) who will provide a response"
Completion of Public Request for Information Forms completed in the last There were no Public Request for Information Forms completed in the last There were no Public Request for Information Forms completed in the last There were no Public Request for Information Forms completed in the last There were no Public Request for Information Forms completed in the last There were no Public Request for Information Forms completed in the last There were no Public Request for Information Forms completed in the last There were no Public Request for Information Forms completed in the last There were no Public Request for Information Forms completed in the last There were no Public Request for Information Forms completed in the last There were no Public Request for Information Forms completed in the last There were no Public Request for Information Forms completed in the last There were no Public Request for Information Forms completed in the last There were no Public Request for Information Forms completed in the last There were no Public Request for Information Forms completed in the last There were no Public Request for Information Forms completed in the last There were no Public Request for Information Forms completed in the last There were no Public Request for Information Forms completed in the last There were no Public Request for Information Forms completed in the last There were no Public Request for Information Forms completed in the last There were no Public Request for Information Forms completed in the last There were no Public Request for Information Forms completed in the last There were no Public Request for Information Forms completed in the last There were no Public Request for Information Forms completed in the last There were no Public Request for Information Forms completed in the last There were no Public Request for Information Forms completed in the last There were no Public Request for Information Forms completed in the last There were no Public	and the Biosolids Management Policy, and all seventeen elements of the BMP to employees and outside contractors, consistent with assigned roles and responsibilities.	to employees and contractors?	
is sent to the public. year for completeness.	Completion of Public Request for Information Form each time information	Review Public Request for Information Forms completed in the last year for completeness.	There were no Public Request for Information Forms completed in the last year.

Auditors Worksheet	Circle one: Conformance Nonconformance		
Element No.	10 – Operational Controls of Critical Control Points	Audit Number: 10-2017-01	
Provide lead auditor first followed by auditor assistants along with classifications	Nicole Pasch – Environmental Assessment Supe	ervisor (EAS)	
Audit date(s)	March 17, 2017 - March 22, 2017		
List nonconformances: 1. Three of Four Contractor Inspections were con	npleted, 4 th Quarter was not done.		
2.			
3.			
4.			
5.			
6.			
7.			
Comments: In the future, I would not recommen specific, especially related to compliance.	d counting 6/28/2016 as 3 rd quarter, even if you	state that it is being done as "July." Dates are very	
·			
"I have conducted an internal audit of Lead Auditor (MM/DD/YYYY) <u>S</u> / <u>Z³</u> /			
Joint review with BMP coordinator: (MA	M/DD/YYYY) <u>3 /2/ /7</u> Initials: _	Well	

Table 16.1.10 - Internal Auditor's Minimum Question Checklist Element 10 Operational Controls of Critical Control Points Record audit number from worksheet: Auditor Notes Ouestions/Considerations Requirement The maintenance practices have been implemented for all of the critical control points listed in Table 3.1. Have SOP's and maintenance practices been implemented at all Develop and implement standard operating procedures, work management critical control points identified in Table 3.1? practices or other appropriate methods at all critical control points Yes, the SOPs effectively manage the environmental impacts listed in Table 3.1 for the critical control points. Do they effectively manage the environmental impacts listed in throughout the biosolids value chain to effectively manage potential Table 3.1? environmental impacts. Yes, the legal requirements were reviewed in 2016 and this information is in the BMP files. The legal requirements are Have legal requirements been included in operational controls Incorporate all legal and other adopted requirements in the operational cross referenced in the operational controls of Table 3.1 to Table 4.1, "Legal and Other Requirements". (SOP's)? controls of critical control points. The sources for developing operational controls include the NBP code of good practice; MOP 11; NPDES Permit; 40 What sources were considered when developing operational Consider applicable best management practices as defined in various CFR Chapter 1, Parts 136, 258 and 503. State of Michigan Biosolids Laws and Regulations Parts 323.2413 and controls? authoritative sources on biosolids management (e.g., the National Manual of 33.2416 Are they consistent with NBP guidance? Good Practice, Water Environment Federation Manuals of Practice, etc.). Yes, they are consistent with the NBP guidance. Yes. ESD utilizes Maximo as its maintenance management system. The current version is 7.7 and it is maintained by Is a facility maintenance management system in place? Include appropriate preventative maintenance procedures and work Projetech. management systems for maintaining equipment, instrumentation, vehicles, Is it functioning properly? Yes, Maximo is functioning properly. and other treatment technology and process control systems associated with Are records being maintained? Yes, records are being maintained. its biosolids management activities Yes, the (trucking) contractor has implemented their own operational controls for their work involving Critical Control Have contractors implemented their own operational controls for Require that contractors establish their own operational controls consistent Points. The controlled copy is retained in their office and copies are available in the trucks. These are checked during with their roles and responsibilities in biosolids management activities. processes they are responsible for? the quarterly contractor compliance inspections. Three of four quarterly inspections were completed in 2016. All SOP's associated with dewatering the Biosolids have been reviewed and updated if needed. Develop and implement standard operating procedures for dewatering Have SOP's been implemented for all key solids processing equipment? centrifuges and other key solids processing equipment.

Auditors Worksheet	Circle one: Conformance Nonconformance		
Element No.	11- Emergency Preparedness & Response	Audit Number: 11-2017-01	
Provide lead auditor first followed by auditor assistants along with classifications	Nicole Pasch – Environmental Assessment Super	visor (EAS)	
Audit date(s)	March 17, 2017 – March 22, 2017	·	
List nonconformances: 1.			
2.			
3.			
4.			
5.			
6.			
Comments: The contractor's spill response plan q	uarterly reviews are not stored in an accessible lo	cation for audit.	
·			
"I have conducted an internal audit of Lead Auditor (MM/DD/YYYY) 3/20/			
Joint review with BMP coordinator: (MA	M/DD/YYYY) <u>3</u> 1 <u>21 17</u> Initials:	WRIL	

Table 16.1.11 – Internal Auditor's Minimum Question Checklist	December 118 street on Communications	
Element 11 Emergency Preparedness and Response	Record audit number from worksheet:	Auditor Notes
Requirement	Questions/Considerations Are emergency procedures in place to deal with Biosolids related	Yes. SOP 3114 titled "Release Containment Plan for WWTP" includes instructions pertaining to biosolids and our
Establish and maintain Emergency Preparedness and Response Plans and		BMP and are effective.
Procedures to assure effective response to accidents and emergency	emergencies?	Yes.
situations associated with Biosolids management activities.	Are they maintained?	ies.
		Note: The Grand Rapids Wastewater Treatment Plant is now called The Grand Rapids Water Resource Recovery
		Facility, as noted in 2016's audit. The change was not update on SOP 3114.
		The current SOPs related to emergency preparedness have been reviewed, updated if necessary (with the exception of
Review and evaluate the effectiveness of emergency preparedness and	How effective are the procedures?	minor naming convention or staff names) and considered to be effective.
response procedures, including communications systems, and revise them as		minor naming convention or start names) and considered to be effective.
necessary.		al DV
Have all emergency response equipment on site or readily available within a	Is equipment readily available?	Yes, the equipment is tracked by ESD's Computer Maintenance Management System, which generates monthly PM
minimum response time.		work orders to check the equipment and quarterly PM to check pump operation. The equipment is stored in ESD's
·		Fisher Building or the Vehicle Storage Building and readily available for use.
Require contractors to establish and maintain Emergency Preparedness and	Have contractors implemented emergency response procedures?	Yes. The contractor has a Spill Plan and all drivers keep current copies in their vehicles. Controlled copies are kept in
Response Plans and Procedures to assure effective response to accidents and		the corporate office.
emergency situations associated with biosolids management activities.		Yes, the Spill Plan is maintained and reviewed quarterly by the BMP Coordinator or his designee.
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1		

Auditors Worksheet	Circle one: Conformance Nonconformance				
Element No.					
Provide lead auditor first followed by auditor assistants along with classifications	Nicole Pasch – Environmental Assessment Sur	pervisor (EAS)			
Audit date(s)	March 17, 2017 - March 22, 2017				
List nonconformances:					
1.		·			
2.					
3.					
4.					
_					
5.					
6.					
7.					
Comments: SOPs overall should be reviewed for Water Resource Recovery Facility (WRRF). The co	name change from The Grand Rapids Wastewa ontractor's document control plan quarterly rev	ter Treatment Plant (WWTP) to The Grand Rapids iews are not stored in an accessible location for aud			
		<i>1</i>			
"I have conducted an internal audit of Lead Auditor (MM/DD/YYYY) <u></u> /20/	the BMP element noted above." 1 signature:				
Joint review with BMP coordinator: (MA		1,1811			

Table 16.1.12 – Internal Auditor's Minimum Question Checklist		
Element 12 BMP Documentation and Document Control	Record audit number from worksheet:	
Requirement	Questions/Considerations	Auditor Notes
Establish and maintain documentation, documents, and records for the	How is the BMP documented?	The BMP is available on the City's website and also on the ESD's SharePoint site.
Biosolids Management program including the seventeen elements of its	How are records of the BMP maintained?	The documentation is maintained on the ESD SharePoint site and the City's website, greity.us.
BMP.		•
Establish and maintain document control procedures and practices to ensure	Is there a document control procedure in place?	Yes. There is a document control procedure and it is documented in SOP #1110.
that its Biosolids Management program documentation and documents are:	Are documents available and easily located?	Yes. All of the documentation is available and easily located on both the SharePoint site and City's website.
a) available and can be easily located,	Do they follow established document creation protocols?	Yes. The documentation follows established document creation protocols.
b) created following established document creation protocols,	Are they kept up to date?	Yes. The documents are kept up to date.
c) kept up to date through periodic reviews and revision (if applicable),	Are they marked with revision number?	Yes. The documents are marked with a revision number.
d) properly marked with version number, effective date(s), and references	Are they marked with an effective date?	Yes. The documents are marked with an effective date.
to replaced or superseded versions, and	Are they approved by authorized personnel?	Yes. The documents are approved by authorized personnel.
e) approved by authorized personnel.	and may approve any animal and proven and animal	
Establish and maintain records of biosolids management activities and	Are records of Biosolids management activities maintained?	Yes. The records for the Biosolids management activities are maintained and organized by the BMP coordinator.
ensure that they are:	Are the records available and easily located?	The BMP records are organized in a file in the BMP coordinator's office in an orderly manner and filed by type of
a) available and can be easily located, and	Are the records retained for the specified period of time?	record and then by year.
b) retained for the specified period of time	The the records retained for the specifical period of tame.	Yes. The records are retained minimally according to Table 12.2.
Establish documentation, document control and record requirements for	Have contractors implemented document control procedures?	Yes, the contractors have implemented a document control procedure and controlled copies are retained in the
Biosolids management activities conducted by its contractors in Service	Have requirements for document control procedures been included	contractor's offices. Quarterly checks are made to verify versions are available in trucks to all drivers.
Agreements, and incorporate these requirements into its BMP for biosolids.	in service contracts?	
rigicoments, and meorporate these requirements into its Bird for electrical		
	•	

Table 16.1 Internal Auditor's Worksheet		Carifornia Carifornia	nas Manasaformans	
Auditors Worksheet		Circle one: Conforma	nce Nonconformanc	
Element No.	13-2017-01		Audit Number:	01
Provide lead auditor first followed by auditor assistants along with classifications	Carrie Rivette – Wastewa	ter / Stormwater Mainter	nance Superintendent	
Audit date(s)	March 21 – 28, 2017			
List nonconformances: 1. CCP and legal review forms were not all complete.	etely filled out.			
2. Phosphorus loading goal does not appear to ha	ive been addressed.			
3.				
4.				
5.		• ·		
6.				
7.				
Comments: Given that most of the CCP and legal	review forms were incomp	letely, Element 13 is not	in conformance.	
"I have conducted an internal audit o		oted above."	M	
Lead Auditor (MM/DD/YYYY) 3/30	/ <u>//</u> signature:	Com Lkne	<u>// </u>	
			. 211	
Joint review with BMP coordinator: (M/	м/dd/үүүү) <u>З</u> / <u>З</u>	<u> </u>	WCM	
2017 BMP Internal Audit		Page 1 of 9		

Element 13 Monitoring and Measurement	Record audit number from worksheet:	
Requirement	Questions/Considerations	Auditor Notes
Establish and maintain regular monitoring and measurement procedures and practices for all biosolids management activities to assure compliance with applicable legal and other requirements, measure biosolids program performance at critical control points, and track progress toward achieving program goals and objectives.	Are procedures in place to conduct regular monitoring and measurement practices for all Biosolids management activities?	CCPs — With the exception of Significant Industrial Users, Commercial User Discharges, Discharge Authorization Permits, and Pollutant minimization, "no changes needed" is not checked and there is no information under "Verify the monitoring and measurement data is being recorded." Legal — No notes under Monitoring and Measurement data review for 1,5,6,7,9,11, and 12
program goals and objectives.	•	Legal – No notes under Monitoring and Measurement data review for 1,5,6,7,9,11, and 12
		Goals - Cannot find action plan status worksheet for Reducing the amount of Phosphorus loading to the secondary treatment process.
Record monitoring and measurement results and maintain records as established in the record keeping procedures under Element 12.	Provide examples of monitoring and measurement data?	Discharge authorization permit data includes sampling and inspection.
Require contractors to establish and maintain regular monitoring and measurement procedures and practices for all their assigned biosolids management activities, as defined in their service agreement.	Have contractors implemented regular monitoring and measurement procedures for activities they are responsible for? Provide example data?	Monitoring and measurement not indicated on contractor CCP reviews.
Require responsible supervisor to create action plan for each objective they are assigned under element 7.	Is there an action plan for each objective? Was it created by the assigned supervisor? Has each objective been assigned to a supervisor? Are the roles of the appropriate supervisor and/or contractor spelled out in element 7, "Roles and Responsibilities"?	Yes.
At a minimum, each action plan must meet contain: (a) schedule, (b) milestones, (c) resources required, (d) human resources required and their responsibilities.	Does each action plan contain: (a) schedule, (b) milestones, (c) resources required, (d) human resources required and their responsibilities?	Yes.
Appropriate Supervisor to submit a Progress Report, which will contain "Action Plan — Quarterly Progress Report" (see figure 13.1) and the "Action Plan Status Worksheet" (see figure 5.1) to the BMP coordinator within 30 days following the end of the calendar quarter for each objective.	Has a complete Progress Report been submitted within 30 days of the end of each calendar quarter for each objective? Are the roles of the appropriate supervisor and/or contractor spelled out in element 7, "Roles and Responsibilities"?	Yes. The second of the second
Require "Action Plan – Quarterly Report" to contain activities that took place during the previous calendar quarter and any planned activities for the future.	Does "Action Plan – Quarterly Report" contain activities that took place during the previous calendar quarter and any planned activities for the future?	Not sure if previous data is included.
Require "Action Plan Status Worksheet" to reflect any changes in the "Action Plan" as per "plan, do, check, act" policy or any other techniques used to assess performance warrant. The document revision date shall reflect changes made in policy.	Was "Action Plan" modified appropriately per items included in "Action Plan Status Worksheet" and/or "Action Plan – Quarterly Report"? Do the revision dates reflect what appears to be conveyed in any and all reports?	Yes.
BMP Coordinator will schedule a meeting with the appropriate supervisor following the receipt of a written progress report when issues or progress are a concern.	Is this role of the BMP coordinator included in element 7, "Roles and Responsibilities"? Were meetings scheduled by the BMP Coordinator following receipt of the written progress report?	Yes:

Auditors Worksheet	Circle one: Conformance Nonconformance			
Element No.	14-2017-01		Audit Number: 01	
Provide lead auditor first followed by auditor assistants along with classifications		vater / Stormwater Mainte	enance Superintendent	
Audit date(s)	March 28, 2017			
List nonconformances: 1. Nonconformance 2016-03 did not have report	within 5 days and no writ	ten request for extension	is in file.	
2. Pam Ritsema is still listed in Element 6, althou	gh Tom Almonte's email is	provided.		
3.				
4.				
5.				
6.				
7.	•			
Comments:				

Lead Auditor (MM/DD/YYYY) 3/30/17 signature: Com 2 Koth

Joint review with BMP coordinator: (MM/DD/YYYY) 3 /35 /17 Initials:

2017 BMP Internal Audit

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How is progress tracked? Monthly, by investigation committee. Monthly, by investigation committee. Nonconformance 2016-03 did not have report within 5 days and no written request for extension is in file. conformance interviewed and date interviewed and		
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If a non-conformance has been identified) The preliminary non- onformance report shall include the date the non-conformance occurred, all included in the report? Are all recommended changes incorporated in the appropriate policies and/or elements? Is committee chairs	submitting a request to the BMP Coordinator.	
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	conformance report shall include the date the non-conformance occurred, all included in the report? Are all recommended changes incorpo	
lace, root cause analysis report, supporting documentation, recommended responsibilities outlined in "Role and Responsibilities" (element 7)?		irs
	place, root cause analysis report, supporting documentation, recommended responsibilities outlined in "Role and Responsibilities" (eleme	ent 7)?
orrective action, recommended system changes, other observations and	corrective action, recommended system changes, other observations and	
ate corrective actions took place.	date corrective actions took place.	
he BMP Coordinators review the findings of the committee, include How is the BMP Coordinators review of the report with the Cannot find documentation of director review. Program performance report for 2016 is not yet published, but previous		
unimery information in the Biosolids Program Performance, report and committee and subsequent review with the Department Director reports have included summaries.		
eview same with the Department Director during the last quarter of the documented? Was a summary of the non-conformance report		
alendar year. Any non-conformance issues will be resolved within 2 weeks included in the Biosolids Program Performance Report? Were the	butchdur your. This non comormance above him or continued	e the
r as soon as practical. non-conformances resolved within the desired time frame? Were		
any affected training programs modified? Did retraining take place		place
as needed? Are responsibilities outlines in "Roles and	as needed? Are responsibilities outlines in "Roles and	
Responsibilities" (element 7)?	Responsibilities" (element 7)?	
		in the first of th

Auditors Worksheet		Circle one: Conforma		A STATE OF THE STA
Element No.	15-2017-01		Audit Number: 01	
Provide lead auditor first followed by auditor assistants along with classifications	Carrie Rivette – Waste	vater / Stormwater Maint	enance Superintendent	
Audit date(s)	March 30, 2017			
list nonconformances: I. No mention of management review in Periodic	Biosolids Performance	Program report.		
2. No record of review with management found.				
3.		· · · · · · · · · · · · · · · · · · ·		
1.				
5.				
5.				-
Comments: Report was in general conformance	with guidelines.			
I have conducted an internal audit o			D_1/1	
ead Auditor (MM/DD/YYYY) <u></u> <u></u>			all	

Table 16.1.15 – I	nternal Auditor's Minimu	m Question Checklist

Element 15 Periodic Biosolids Program Performance Report	Record audit number from worksheet:	15-2006-01
Requirement	Questions/Considerations	Auditor Notes
Complete a periodic written Biosolids Management Program Performance Report (at least annually), summarizing the performance of the biosolids management program. The report shall contain appropriate summaries of monitoring, measurements data collected as part of the action plans and	Has a Biosolids management program performance report been completed? If so, review for inclusion of requirements.	Yes, for 2015. No summary of periodic management review of performance. Summary of 3 rd party audit included.
other results that demonstrate the performance of the biosolids program relative to its goals, objectives and legal requirements, including those biosolids management activities conducted by contractors. The report shall	Does it include a summary of third party or interim audit?	
also provide summaries of performance relative to other voluntary adopted requirements, the organization's progress toward achieving its Biosolids program goals and objectives, and a summary of its independent third party BMP verification audit results.		
Make the periodic Biosolids Management Program Report available to employees, contractors, interested parties and the public. The organization shall have the flexibility of using other methods, including electronic methods such as a biosolids program web page, in addition to or in lieu of a	Has the report been made available to employees, contractors, interested parties and the public?	Yes:
written periodic performance report. The Biosolids Management Program Report will take place annually in the first quarter of the year. The Biosolids Management Program Report shall be performed by the BMP Coordinator with assistance from the BMP internal team.	Was the Biosolids Management Program Report written during the first quarter of the year?	Yes,
The Biosolids Management Program Report will be reviewed by the department director as part of the periodic management review during the first quarter of the year.	Was the Biosolids Management Program Report reviewed during the first quarter of the year during the periodic management review?	Unknown.
The final Biosolids Management Program Report shall be issued during the first quarter of the year.	Was the final Biosolids Management Program Report issued during the first quarter of the year?	Yes.
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ang dikanan dikanan di kacamatan di kacamatan di kacamatan di kacamatan di kacamatan di kacamatan di kacamatan Kacamatan di kacamatan di kacama Kacamatan di kacamatan di kacama	A CONTRACTOR OF THE CONTRACTOR	and the first the state of the
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er en	AND SERVICE SERVICES	
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Auditors Worksheet	Circle on	e: Conforman	ce Nonconformance	
. Element No	o. 16-2017-01		Audit Number:	01
Provide lead auditor first followed by auditor assistants along with classification	Carrie Rivette – Wastewater / Stor	mwater Maintena	nce Superintendent	
Audit date(s	March 28, 2017			
nonconformances:				
			•	
		•		
	•			
			•	
nments: While the audit is not complete, all	assignments have been made approp	riately and require	ements of element 16 ha	ve been met.
•				

Table 16.1.16 - Internal Auditor's Minimum Question Checklist

Table 16.1.16 – Internal Auditor's Minimum Question Checklist		
Element 16 Internal BMP Audit	Record audit number from worksheet:	
Requirement	Questions/Considerations	Auditor Notes
Establish and maintain an internal audit program to periodically analyze the	Has an internal audit program been implemented?	Findings are presented to committee and in performance report.
BMP for biosolids and determine whether it is effectively meeting its	How are findings communicated?	
biosolids management policy, program requirements and biosolids program	Does it include contractor activities?	
goals and objectives. The internal BMP audit program shall define the		
scope, frequency, and methodology of the audits, assign responsibility for		
conducting the audits and communicating their findings, and designate		
individuals to whom these findings are to be conveyed. The internal audit	•	
shall also evaluate the organization's performance relative to established		
biosolids program goals, objectives and performance measures. The internal		
BMP audit program shall cover all the organization's biosolids management		·
program activities including those performed by contractors.		
Report internal BMP audit results to the organization's management in a	Is there a system in place to respond to issues identified during the	Yes.
way that they can take action to make necessary modifications to the BMP	internal audit process?	* .
and biosolids management program. The person responsible for the	morning and processor	
biosolids management program shall develop, or delegate the development		
of, a comprehensive corrective action plan addressing each nonconformance		
identified by the internal audit.		
Maintain, at a minimum, the following documents and records, as	Is the audit methodology identified?	Upon completion of the audit, non-conformances will be issued and corrective action plans made, if applicable.
applicable, relating to its audit program:	Is the audit memodology identified?	of the man, non conformation will be seen of the man, it applicable.
a) description of audit methodology, protocol, scope, and schedule;	Is the lead auditor identified?	
b) identification of lead auditor(s), qualifications, and description of roles	Are corrective action plans issued for non-conformances?	
and responsibilities of auditors, management representatives, and others	Are corrective action plans issued for non-conformances:	
that may participate in, review, or be expected to act upon the audit; and		
c) Corrective and/or preventive action plans prepared resulting from an		
audit, and any related changes made to policies, plans, procedures, and	·	·
work practices that occur as a result of an audit's findings, evaluation, or	· ·	
follow-up actions.	TY the internal of the	In process
Internal audit will be conducted annually during the first quarter of the	Has the internal audit been completed during the first quarter of the	In process.
calendar year.	calendar year?	
Each member of the City Internal BMP team will be responsible for auditing	Have all elements been assigned to a City Internal BMP team	All elements have been assigned per element 7.
selected elements of the BMP. Internal BMP team members may assign	member? Are those responsibilities reflected in "Roles and	
responsibility to staff within their scope of authority once they have been	Responsibilities" (element 7)? If team members have assigned	· ·
trained as auditors.	responsibility to other staff members, have those persons been	
	trained as auditors?	
Each internal auditor will be trained and provided with an internal auditor's	Were the auditors provided with an internal auditor's worksheet	Yes.
worksheet along with the minimum conformance requirements.	along with the minimum conformance requirements?	
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